

11.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

NEODIAGNOSTIX, INC.	)	
	)	
Plaintiff,	)	
	)	Civil Action No. _____
v.	)	
	)	
THERANOSTIX, INC., P4 DIAGNOSTIX LLC,	)	
P4 CLINICAL LLC, AND SATHISH	)	
REDDY A/K/A SATHISH KOTHANDARAM	)	
OR SATHISH KOTHANDARAM REDDY	)	
OR SATHISH K. REDDY	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE  
COMPLAINT UNDER SEAL**

Plaintiff Neodiagnostix, Inc. (“Plaintiff”), by and through its undersigned attorneys, hereby seeks leave to file its Complaint and the exhibits thereto in the above-captioned matter under seal.

In support of this motion, Plaintiff states as follows:

1. This is a civil action brought against defendants Theranostix, Inc., P4 Diagnostix LLC, P4 Clinical LLC, and Sathish Reddy (collectively, “Defendants”) to obtain relief for patent infringement and breach of contract.

2. On September 1, 2014, Plaintiff and a predecessor-in-interest to Defendants entered into a “Collaborative Services Agreement” (the “Agreement”) with plaintiff NeoDiagnostix. A true and correct copy of the Agreement is attached to the Complaint as Exhibit H. The Agreement contains confidential information of the parties and obligates the parties to prevent the disclosure of such confidential information.

3. If Plaintiff disclosed confidential information protected by the Agreement, Defendants might claim that Plaintiff breached the Agreement.

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4. Plaintiff therefore seeks leave to file its Complaint and exhibits thereto Under Seal.

5. Plaintiff will file a public version of the Complaint, with the confidential information redacted, within seven days of this motion being granted.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests leave to file its Complaint and exhibits thereto in this matter under seal.

Dated: November 25, 2019  
OF COUNSEL:  
Nicole D. Galli  
Law Offices of N.D. Galli LLC  
2 Penn Center Plaza, Suite 910  
1500 JFK Blvd  
Philadelphia, PA 19102  
(215) 525-9580  
ndgalli@ndgallilaw.com

BAYARD, P.A.

/s/ Stephen B. Brauerman  
Stephen B. Brauerman (#4952)  
600 N. King Street, Suite 400  
P.O. Box 25130  
Wilmington, Delaware 19801  
(302) 655-5000  
sbrauerman@bayardlaw.com

*Attorneys for Plaintiff  
NeoDiagnostix, Inc.*